

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

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: Chapter 11
In re: :
: Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., *et al.*, :
: Debtors. :
: :
: :
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MOTION TO ADMIT COUNSEL PRO HAC VICE

NOW COMES William Daniel Sullivan, counsel for Pioneer Electronics, Inc. (“Pioneer”) in this case and a member of the bar of this Court, and moves, pursuant to Local Rule 2090-1(E)(2), for the admission *pro hac vice* of Max Newman of Butzel Long, a professional corporation, Stoneridge West, 41000 Woodward, Bloomfield Hills, Michigan 48304, in support thereof, Movant states as follows:

1. Max J. Newman graduated for the University of Michigan Law School in 1994 and was admitted to practice in the State of Michigan in 1994. Mr. Newman is a member in good standing of the State Bar of Michigan. Mr. Newman is admitted to practice in the Eastern District of Michigan and Western District of Michigan and has been admitted either generally or *pro hac vice* for cases in Delaware, the Southern District of New York, the Eastern District of Texas, the Northern District of Texas, the Northern District of Ohio, and the Northern District of Indiana.

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2. Mr. Newman's admittance to practice law has never been revoked and he is not the subject of any disciplinary proceedings.

3. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this motion, Movant requests that the requirement that all motions be accompanied by a written memorandum of law be waived.

4. No previous request for relief sought herein has been made to this Court or any other court.

WHEREFORE, the Movant requests this Court enter an order admitting Max J. Newman of the firm Butzel Long, *pro hac vice* to the bar of this Court for the conduct of this case.

Respectfully submitted,

PIONEER ELECTRONICS, INC.

/s/ William Daniel Sullivan
By: William Daniel Sullivan
Counsel

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Certificate of Service

I hereby certify that true copies of the foregoing motion and the accompanying proposed order served on all other parties entitled to notice hereof by electronic copies hereof delivered through the Court's ECF system. In view of the timing of the requested relief (for a telephone hearing on November 12), no US mail copy has been served upon the Office of the United States Trustee.

/s/ William Daniel Sullivan